

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

**BAHIA AMAWI**

Plaintiff,

vs.

**PFLUGERVILLE INDEPENDENT SCHOOL  
DISTRICT; and**

**KEN PAXTON**, in his official capacity as  
Attorney General of Texas,

Defendants.

Case No. 1:18-cv-01091-RP

**DECLARATION OF LENA F. MASRI**

I, Lena F. Masri, swear under the penalty of perjury that the following facts are true to the best of my knowledge, information, and belief:

1. I have personal knowledge of the facts set forth below. If I were called as a witness, I could competently testify about what I have written in this declaration.
2. I am currently a member of good standing of the following bars: Michigan, District of Columbia, Virginia, and New York.
3. I graduated from Indiana University – Indianapolis School of Law in 2008. Since getting admission to the Michigan bar in 2009, I have practiced law full-time.
4. From October 2009 until January 2017, I was an attorney for CAIR-Michigan and served at that organization’s legal director for many years. From January 2017 until the present, I have worked for CAIR Foundation where I serve as its National Litigation Director and General Counsel. My litigation work is on behalf of CAIR Legal Defense Fund.

6. I thus had a total of nearly 10 years of legal experience when I started this case. At this point, I have a total of over 11 years of legal experience.

7. I am an attorney of record for Bahia Amawi who has worked on this case.

8. During the course of CAIR Legal Defense Fund's representation of Bahia Amawi on this matter, I have recorded the time spent performing legal services in this case. I entered in a description of the legal services together with the precise time, to a quarter hour, always rounding down. I did not record time for tasks that took less than 15 minutes. In the process of preparing this fee motion, I then coordinated the time I spent listed, rounding up to the nearest .1. A true and correct copy of the spreadsheet recording that time is attached as Exhibit A.

9. The total amount of hours I expended in this action is 26.7 hours. Of that time, 25.9 hours were spent on litigating this case in federal district court prior to May 7, 2019, the date Texas amended the Anti-BDS law at issue in this case, and 0.8 hours were spent litigating this case in federal district court after that date.

10. I certify that the hours listed were actually expended on the topics stated in my time sheet.

11. I certify that the hours expended were reasonable.

12. CAIR Legal Defense Fund's fee agreement with Amawi is in the form of a contingency agreement. No hourly rate for attorney work is listed. CAIR attorneys do not typically charge an hourly fee in their customary business, as CAIR Legal Defense Fund is a civil rights nonprofit.

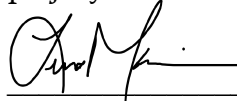
13. The current U.S. Attorneys Office *Laffey* matrix for the District of Columbia uses a \$417 hourly rate for an attorney with my experience for 2018, a \$433 hourly rate for an

attorney with my experience in 2019, and a \$510 hourly rate for an attorney with my experience in 2020. See <https://www.justice.gov/usao-dc/page/file/1189846/download>.

14. I certify that a rate of \$550 per hour for my work is reasonable.

15. As National Litigation Director for CAIR Legal Defense Fund, I am in charge of reviewing costs in this matter. I have reviewed the costs spreadsheet attached as Exhibit B. I have seen all of the receipts on file and certify that all the costs listed were actually incurred in this case. I further certify that all the costs were reasonably incurred in pursuing Amawi's case.

16. I swear under the penalty of perjury that the foregoing is true and correct.



Lena F. Masri

7/6/20

Date

**Exhibit A - Masri Hours**

| Project                | Timekeeper | Date       | Hours | Description  |
|------------------------|------------|------------|-------|--|
| Complaint              | Lena Masri | 11/5/2018  | 1.5   | Legal strategy to discuss claims and procedural options  |
| Complaint              | Lena Masri | 12/12/2018 | 1     | Review draft complaint; discussion with team   |
| Complaint              | Lena Masri | 12/15/2018 | 1     | Formulated strategy re complaint   |
| Preliminary Injunction | Lena Masri | 12/19/2018 | 0.8   | Review draft PI motion; provide feedback   |
| Opp to MTD             | Lena Masri | 3/5/2019   | 1.3   | Review draft MTD opp brief; provide feedback   |
| Preliminary Injunction | Lena Masri | 3/19/2019  | 2.5   | Hearing preparation and strategy discussion (ie, whether to offer testimony; evidence to admit, determining team responsibilities) |
| Preliminary Injunction | Lena Masri | 3/27/2019  | 1.5   | hearing prep, mini-moot, assign team responsibilities  |
| Preliminary Injunction | Lena Masri | 3/28/2019  | 5.5   | review hearing materials, travel to Austin   |
| Preliminary Injunction | Lena Masri | 3/29/2020  | 10    | hearing prep, attend hearing, client debrief, travel leaving Austin  |
| Preliminary Injunction | Lena Masri | 4/25/2019  | 0.8   | review PI decision   |
| MTD                    | Lena Masri | 7/23/2019  | 0.8   | review MTD decision  |

Time was initially calculated to the .25, rounding down. Tasks taking less than 15 minutes were excluded. Time was then rounded to the nearest

**Exhibit B - Litigation Costs**

| Payee/Expense           | Date       | Amount   | Description                                      | \$5,320 |
|-------------------------|------------|----------|--|---------|
| DC Bar                  | 11/27/2019 | \$25     | Certificate of Good Service for admission        |         |
| Printing                | 12/4/2019  | \$10.31  | Printing reimbursement for hearing               |         |
| Arlinda Rodriguez       | 5/16/2019  | \$129    | Transcript fee for hearing                       |         |
| Case Team Solutions LLC | 5/22/2019  | \$77.27  | Copying and printing for hearing                 |         |
| Per Diem                | 5/15/2019  | \$75     | Per Diem for hearing (Lena Masri)                |         |
| Per Diem                | 5/15/2019  | \$125    | Per Diem for hearing (Gadeir Abbas)              |         |
| Per Diem                | 12/4/2019  | \$100    | Per Diem for hearing (Carolyn Homer)             |         |
| Travel                  | 3/28/2019  | \$309    | Holday Inn (Hearing/Abbas)                       |         |
| Travel                  | 3/28/2019  | \$149    | Fairfield Marriott (Hearing/Masri)               |         |
| Travel                  | 12/4/2019  | \$295.93 | Mileage, Parking, Airplane WiFi and Ground Tran: |         |
| Car Rental              | 3/28/2019  | \$109.18 | Hearing - Lena Masri                             |         |
| Parking                 | 3/29/2019  | \$16.00  | Hearing - Lena Masri                             |         |
| Southwest Airlines      | 3/5/2019   | \$251.00 | Air travel for hearing (DC to Austin RT - Homer) |         |
| Southwest Airlines      | 3/29/2019  | \$367.00 | Change fee for flight - Carolyn Homer            |         |
| Southwest Airlines      | 3/5/2019   | \$156.00 | Air travel for hearing (Detroit to Austin RT)    |         |
| Southwest Airlines      | 4/1/2019   | \$629.68 | Air travel for hearing (Chicago to Austin RT)    |         |
| Southwest Airlines      | 12/16/2018 | \$620.98 | Air travel for complaint (Chicago to Austin RT)  |         |
| Delta Airlines          | 3/27/2020  | \$942.70 | Air travel for hearing (Detroit to Austin RT)    |         |
| Filing Fee - WDTex      | 12/16/2018 | \$400    | Complaint filing fee                             |         |
| Filing Fee - WDTex      | 12/19/2018 | \$100    | PHV Filing Fee - Lena Masri                      |         |
| Filing Fee - WDTex      | 12/19/2018 | \$100    | PHV Filing Fee - Gadeir Abbas                    |         |
| Filing Fee - WDTex      | 12/19/2018 | \$100    | PHV Filing Fee - Carolyn Homer                   |         |
| Admissions fee - CA5    | 11/19/2019 | \$231    | CA5 Admission fee                                |         |